

IMPORTANT NOTICE: The Information contained in this facsimile message is intended only for the use of the individual or entity named on this transmission sheet. It may contain information that is privileged and confidential. If the reader of this message is not the intended recipient, you are notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this facsimile message in error, please notify us immediately by calling collect the telephone number listed above and return the original message to us at the above address via the United States Postal Service. We will reimburse you for postage. Thank you.

October 15, 2001

Mr. Jon Heinrich  
Wis. Dept. of Natural Resources  
Bureau of Air Management  
PO Box 7921  
101 South Webster Street  
Madison, WI 53707-7921

Re: Stora Enso North America Submittal of Comments on the Proposed Rule NR 446 Control of Mercury Emissions

Dear Mr. Heinrich:

Stora Enso North America appreciates the opportunity to submit comments on the Wisconsin Department of Natural Resources proposed rule NR 446 addressing the control of mercury emissions.

Stora Enso North America (SENA) is a Division of Stora Enso, one of the world's leading forest products companies. Stora Enso is domiciled in Finland. Its core businesses include magazine papers, newsprint, fine papers and packaging boards. SENA employs approximately 6,500 people and has pulp and papermaking operations in Wisconsin Rapids, Stevens Point, Whiting, Kimberly, Niagara and Biron, Wisconsin; Duluth, Minnesota; and Port Hawkesbury, Nova Scotia, Canada. The Division is one of North America's leading producer of coated and super calendared printing papers for the printing and publishing industry and is a premier producer of specialty papers and manufactures paperboard products.

While the proposed rule, NR 446, targets coal-fired utility boilers as the principle source for mercury emission reductions, the proposed rule also addresses industrial sources and other stationary sources that emit more than ten pounds of mercury a year.

Stora Enso North America has serious concerns with NR 446 as proposed and as a result is opposed to the proposed NR 446. In general, our Concern are as follows:

- The proposed rule will provide very little, if any, environmental benefit.
- Significant increases in electric rates for SENA Wisconsin operations at the higher mercury reduction levels.
- The use of historical mercury emission information for establishing the basis for regulation.
- The proposed methodologies for determining baseline mercury emissions.
- The mass emission cap proposed for industrial sources and the restrictions it could place on SENA's productivity and economic growth for our Wisconsin operations.
- Conflict with Federal laws currently being considered for both utility and industrial boilers.
- The absence of a variance from reduction requirements for industrial sources.

SENA is still in the process of completing its analysis of the proposed NR 446. As a result, we will be submitting additional information to supplement and expand on the issues identified above. It is my understanding that the Department will be accepting additional information until October 29, 2001. If the Department needs SENA's additional information sooner, please contact me at (715) 422-3507.

Sincerely,

STORA ENSO NORTH AMERICA  
Annabeth Reitter  
Division Air Programs Manager

CC: Tom Scharff - PS I Jim Weinbauer - MO-2